

November 8, 2016

Via ECF

The Honorable Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East, Rm. N208
Brooklyn, New York 11201

Re: *Gigantino v. Turner Construction, et al.*
Civil No. 14-3619
GS File No. 4106.0008

Dear Judge Reyes,

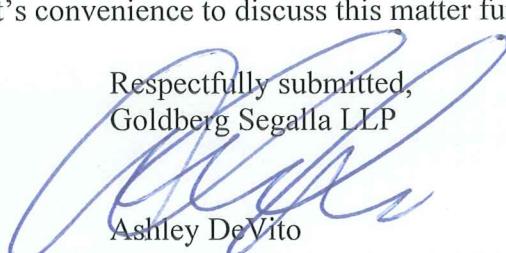
We represent Defendants Turner Construction Company and Delta Airlines, Inc. (hereinafter "Defendants") in the above-referenced action. We submit this joint letter on behalf of all parties proposing the below discovery scheduling order pursuant to the recent conference with the Court.

The parties respectfully request the following discovery order:

- Plaintiff to provide authorizations to Defendants by November 24, 2016.
- Plaintiff's deposition regarding damages to be held on or before January 19, 2017;
- Independent medical examinations to be held on or before February 19, 2017;
- Plaintiff's damage expert(s) witness disclosures including treating physicians and any other experts retained, are due on or before February 1, 2017.
- Plaintiff's damage expert(s) depositions shall be completed on or before March 1, 2017;
- Defendants' damage expert(s) witness disclosure are due on or before March 16, 2017;
- Defendants' damage expert(s) depositions shall be completed on or before April 17, 2017.
- Parties to file a joint pre-trial order no later than May 17, 2017.

We are available at the Court's convenience to discuss this matter further.

Respectfully submitted,
Goldberg Segalla LLP


Ashley DeVito

/ATD

CC: Michael S. Fabiani, Esq. (via ECF)
Kreindler & Kreindler, LLP
750 Third Avenue
New York, NY 10017